

Amendments to the Drawings:

The drawings stand objected to under 37 C.F.R. §1.83(a) with the Examiner concluding that the claim features must be shown in the drawings. Submitted herewith are new drawings 3-6 which set forth illustration of the claimed invention. The specification has been amended to conform the description therein to the new drawings.

REMARKS

The present invention is a method of user policy management in a communication system and in a policy-based system. The method includes receiving user-entered policies in a representation understandable to naïve users and capable of translation into a formal executable language; translating the policies from the representation into an executable feature language capable of execution by the communication system; translating the policies from the executable feature language into a policy language and detecting common feature interaction errors between the policies; analyzing the feature interaction errors to identify errors that are common to the naïve users; reporting the errors that are common to the user in the user-understandable representation; providing the user with a recommendation understandable to the naïve users for correction of the feature interaction errors and re-integration of the policies in the executable feature language; and uploading the policies for execution by the communication system.

Claims 15-28 stand rejected to as being substantial duplicates of claims 1-14. This conclusion is erroneous for the following reasons.

In the first place, the second full paragraph on page 17, begins with the topic sentence that "[c]laim 1 and claim 15 respectively recite a method of user-policy management in a communication system and a method of user-policy management in a policy-based system". The Examiner's statement quoting the immediately previous sentence is out of context since what the undersigned was intending to convey was the difference in scope which is that while both claims 1 and 15 are to a method, they respectively recite the method in the preamble of claim 1 as "a method

of user policy management in a communication system" and the last step of claim 1 as "uploading said policies for execution by said communication system" whereas claim 15 recites a different method of "[a] method of user policy management in a policy-based system" in the preamble and the last step of claim 15 as "uplifting said policies for execution by said policy-based system". Accordingly, the preambles of claims 1 and 15 are different in scope in that claim 1 recites a method limited to "a communication system" which is required for claim construction purposes by the last uploading step incorporating the preamble by referring to "said communication system" whereas claim 15 recites a method limited to a policy-based system which is required for claim construction purposes by the last uploading step incorporating the preamble by referring to "said policy-based system" which is not limited to a communication system as recited in claim 1. Accordingly, the Examiner's conclusion that the claims are identical is legally erroneous.

Moreover, as the Examiner is aware, reference in the body of the claim to the preamble is understood for claim construction to require the preamble, such as recited in the present claims, to be considered substantively in accessing the scope of the claim. Accordingly, while the claims have similar method steps, they are not identical in scope since claim 1 is limited to user policy management in a communication system whereas claim 15, is limited to "user policy management in a policy-based system" which is different in scope.

The drawings stand objected to under 37 C.F.R. §1.83(a) with the Examiner concluding that the claimed features must be shown in the drawings. Submitted herewith are new drawings 3-6 which set forth illustration of the claimed invention.

The specification has been amended to conform the description therein to the new drawings.

Claims 1-28 stand rejected under 35 U.S.C. §112, second paragraph.

Claims 1, 2, 5, 9, 12, 15, 16, 19 and 23 have been amended to overcome the stated grounds of rejection.

Claims 1 and 2 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Publication No. 2003/0065942 A1 (Lineman et al) in view of U.S. Patent 6,327,618 (Ahlstrom et al) in view of United States Patent 6,418,468 (Ahlstrom et al II). The Ahlstrom Patents are newly cited. These grounds of rejection are traversed for the following reasons.

If the proposed combination were made, the subject matter of claims 1 and 2 would not be obvious for the following reasons.

The Examiner considers Lineman et al to disclose a method of user policy management in a communications system comprising receiving user-entered policies in a user-understandable representation capable of translation into a formal executable language (see paragraphs [0028], [0032] [0033] and [0053]); translating said policies from said user-understandable representation into an executable feature language capable of execution by said communication system (see paragraphs [0033], [0034] and [0053]); translating said policies from said executable feature language into a policy language (see paragraphs [0037] and [0056]); re-integration of said policies in said executable feature language (see paragraphs [0035] and [0057]) and uploading said policies for execution by said communication system (see paragraphs [0035] and [0037]).

It is submitted that the Examiner has improperly analyzed the teachings of Lineman et al and therefore, even if the proposed combination were made, the subject matter of claims 1 and 2 would not be achieved. Specifically, Lineman et al disclose a method and apparatus for actively managing the security policies for users in computers in a network which policies pertain to company information and assets. Paragraph [0028] of Lineman et al disclose a policy server loaded with a policy management program 42 for publishing security policies to users and their computers within a network. Paragraph [0033] discloses a security policy doctrine created by the policy management program 42 in a structured data representation having elements 74 and 75. The structured data representation includes a human-readable form which is element 75 and includes a machine-readable form which is element 76. The human-readable form contains security guidelines reflecting the security policies in the document with the security guidelines addressing the behaviors of users 54 in the network. Paragraph [0053] specifies that the security policy document is preferably represented using a structured data representation such as Extensible Mark-up Language (XML), Standard Generalized Mark-up Language (SGML), or object languages, such as Unified Modeling Language (UML), computing languages, such as Java and Java Script, or other portable representation languages.

While Lineman et al may be argued to suggest "translating said policies from said user-understandable representation into an executable feature language capable of execution by said communication system" and "uploading said policies for execution by said communication system", there is no disclosure in Lineman et al of the additional translation step of "translating said polices from said executable

feature language into a policy language and detecting common feature interaction errors between said policies". Moreover, the step of "analyzing said feature interaction errors to identify errors that are common to naïve users" would not occur since the claimed detection of interaction common feature errors between said policies would occur only consequent from the claimed translation of said policies from executable feature language into a policy language which has no counterpart in Lineman et al. Finally, there is no counterpart of "re-integration of said policies in said executable feature language."

The Examiner's conclusion that "communication of XML file to machine-readable code for use by the computer system's may be interpreted as translating the executable feature language into a policy language" is erroneous. While the Examiner is permitted to give claims their broadest reasonable interpretation, in fact, there is no translation into any language which corresponds to the second translation step of "translating said policies from said executable feature language into a policy language" which occurs after the claimed "translating said policies from said user-understandable representation into an executable feature language capable of execution by said communication system".

What Lineman et al disclose is translation from a user-understandable representation into an executable feature language comprised of XML data elements. However, Lineman is totally silent on the translating from XML to machine-readable code as suggested by the Examiner. As is set forth clearly in paragraph [0056] of Lineman et al, the XML data element 202 includes data elements 218-226 for implementing the security policy on computer systems with

there being no translation required to produce the aforementioned data elements 218-226.

Paragraph [0035] of Lineman et al disclose that the policy management program distributes the security policy document, which is element 78 of Fig. 2, to both users which are element 80 and to computer systems which are elements 90. Moreover, paragraph [0057] discloses presenting the distributed XML file 200 to a user accessing the policy server 40 with a web browser program 52.

The Examiner has also asserted that the contents of the XML communications between the computer systems across the network as machine-readable code must be "subsequently re-integrated into an XML file on the receiving side" and "this may interpreted as re-integrating the policy into an executable feature language". However, as stated above, Lineman et al do not provide any translation from XML to machine-readable code subsequent to translating from user-understandable representation into machine-readable code (data elements of the XML document). Given that there is no translation corresponding to "translating said policies from said executable feature language into a policy language", there is no need, in Lineman's system, to provide re-integration of policies into said executable feature language. The policy document in Lineman is already expressed as an XML document having human-readable and machine-readable data elements making subsequent processing to convert the policy information from one form to another from unnecessary. Accordingly, the XML document may be communicated across the network without any translation to machine-readable code or re-integration from machine-readable code to XML as recited respectively in the second translating step and the providing step.

Neither of the Ahlstrom et al Patents provide the foregoing teachings. Therefore, even if the proposed combination, as suggested by the Examiner, was made to combine Lineman with the two Ahlstrom et al Patents, the claimed subject matter would not be achieved.

Moreover, it is submitted that the Examiner is engaging in the hindsight reconstruction of the claimed invention by proposing the combination of Lineman et al and the two Ahlstrom Patents. While each of Lineman et al and the two Ahlstrom et al Patents do pertain to policy systems, the Examiner has provided no rationale why a person of ordinary skill in the art would consider the combination of Lineman et al and the two Ahlstrom et al Patents to achieve the claimed invention without impermissible hindsight. The Examiner is using the Applicant's disclosure as a roadmap to suggest a proposed combination to achieve the claimed subject matter.

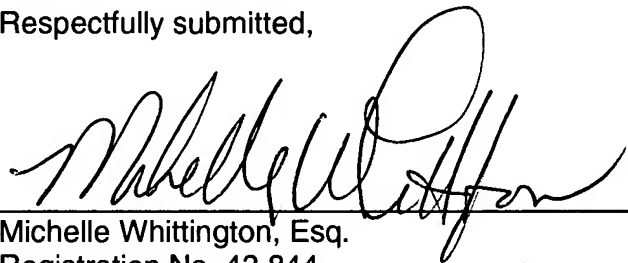
Moreover, as stated above, even if the proposed combination were made, the teachings of Lineman et al have been erroneously construed to include the "translating said policies from said executable feature language into a policy language and detecting common feature interaction errors between said policies," "analyzing said feature interaction errors to identify errors that are common to naïve users" and providing "re-integration of said policies in said executable feature language".

Claims 3-28 define more specific aspects of the present invention which are not rendered obvious by the proposed combination of Lineman et al and the two Ahlstrom et al Patents.

In view of the foregoing amendments and remarks, it is submitted that each of the claims in the application is in condition for allowance. Accordingly, early allowance thereof is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 502721 and please credit any excess fees to such Deposit Account.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michelle Whittington", is written over a horizontal line.

Michelle Whittington, Esq.
Registration No. 43,844

Attachments

DES:dlh